

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF TODD R. BOWERS
IN SUPPORT OF PLAINTIFFS' MOTION
TO COMPEL

NOTE ON MOTION CALENDAR:
Wednesday, May 21, 2025

I, Todd R. Bowers, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am a Deputy Attorney General in the Washington State Attorney General's Office. I have served in this role since 2017 and have served as an attorney and supervisor in the Attorney General's Office since October 1995. I supervise the work of the litigation team handling this matter.

3. The Washington State Attorney General's Office uses set hourly billing rates, updated periodically, for its attorneys and paralegals, based on the reasonable and customary fees charged in the area for professionals with similar years of experience in the relevant subject matter.

4. William McGinty is a Deputy Solicitor General in the Washington State Attorney General's Office and is one of the attorneys of record in this action. Mr. McGinty graduated from the University of California, Berkeley, School of Law in 2009, and was admitted to the Washington State Bar the same year. He joined the Washington State Attorney General's Office in 2013. He regularly handles litigation in U.S. District Courts. The billing rate for Mr. McGinty is \$517 per hour. This is a reasonable rate for an attorney with Mr. McGinty's experience. Mr. McGinty spent 3.5 hours researching and writing sections of DOJ's requested meet-and-confer letter related to the deficiency of boiler-plate objections, the necessity to identify withholdings, the necessity to include a privilege log where materials are withheld on the basis of claimed privilege, preparing the motion, preparing supporting declarations, and preparing supporting exhibits.

5. Assistant Attorney General Colleen Melody is the Chief of the Civil Rights Division in the Washington State Attorney General's Office and is one of the attorneys of record in this action. Ms. Melody graduated from the University of Washington Law School in 2009, and was admitted to the Washington State Bar in 2010. She clerked for the Honorable Ronald M. Gould of the U.S. Court of Appeals for the Ninth Circuit, then spent nearly five years with the U.S. Department of Justice's Civil Rights Division in Washington, D.C. Since 2015, she has served in the Civil Rights Division where she regularly handles litigation in U.S. District Courts and U.S. Courts of Appeals. The billing rate for Ms. Melody is \$517 per hour. This is a reasonable rate for an attorney with Ms. Melody's experience. Ms. Melody spent 2.5 hours researching and writing sections of DOJ's requested meet-and-confer letter related to deliberative process, attorney client, and work product privileges.

6. Assistant Attorney General Andrew Hughes is a Section Chief of the Complex Litigation Division in the Washington State Attorney General's Office and is one of the attorneys of record in this action. Mr. Hughes graduated from Harvard Law School in 2011 and was admitted to the Illinois State Bar that same year, then the Washington State Bar in 2015. He

1 clerked for Chief Justice Dana Fabe of the Alaska Supreme Court, then spent six years in private
 2 practice in Chicago and Seattle, before joining the Complex Litigation Division in 2018. He
 3 regularly handles litigation in U.S. District Courts and U.S. Courts of Appeals. The billing rate
 4 for Mr. Hughes is \$466 per hour. This is a reasonable rate for an attorney with Mr. Hughes's
 5 experience. Mr. Hughes spent 13.7 hours performing research and drafting meet-and-conference
 6 letter, performing research for the motion, preparing the motion, preparing supporting
 7 declarations, and preparing supporting exhibits.

8 7. Paralegal Victoria Johnson is a supervising Paralegal 2 in the Complex Litigation
 9 Division in the Washington State Attorney General's Office and is the primary professional staff
 10 member assigned to this action. Ms. Johnson has worked in the division since May of 2021. The
 11 billing rate for Ms. Johnson is \$158 per hour. This is a reasonable rate for a paralegal with
 12 Ms. Johnson's experience. Ms. Johnson spent 5 hours preparing the motion and supporting
 13 papers.

14 8. Paralegal Tally Locke is a Paralegal 1 in the Complex Litigation Division in the
 15 Washington State Attorney General's Office and is the secondary professional staff member
 16 assigned to this action. Ms. Locke has worked in the Attorney General's Office since
 17 October 2021. The billing rate for Ms. Locke is \$158 per hour. This is a reasonable rate for a
 18 paralegal with Ms. Locke's experience. Ms. Locke spent 4 hours preparing the motion and
 19 supporting papers.

20 9. Paralegal Trista Friend is a Paralegal 2 in the Complex Litigation Division in the
 21 Washington State Attorney General's Office and is another professional staff member assigned
 22 to this action. Ms. Friend has worked in the Attorney General's Office since November 2023.
 23 The billing rate for Ms. Friend is \$158 per hour. This is a reasonable rate for a paralegal with
 24 Ms. Friend's experience. Ms. Friend spent 4 hours preparing the motion and supporting papers.

25 10. The total of the hourly rates above, multiplied by the hours worked, is \$11,540.20.
 26 This is not a full account of the costs to the Attorney General's Office to bring this motion. For

1 example, this does not account for time spent preparing for and participating in a meet-and-
2 confer, nor for the work of other attorneys on the team who reviewed the motion and provided
3 feedback prior to finalizing. I will supplement this declaration when the reply brief in support of
4 this motion is filed.

5 I declare under penalty of perjury under the laws of the State of Washington and the
6 United States of America that the foregoing is true and correct.

7 DATED this 30th day of April 2025 at Seattle, Washington.

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TODD R. BOWERS, WSBA #25274
10 Deputy Attorney General
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